

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

MIRIAM EDWARDS, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

MCDERMOTT INTERNATIONAL, INC.,  
DAVID DICKSON, and STUART  
SPENCE,

Defendants.

§ CIVIL ACTION NO. 4:18-cv-04330

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**NOTICE OF MOTION AND MOTION OF  
WAH KEE HO FOR APPOINTMENT AS  
LEAD PLAINTIFF AND APPROVAL OF  
LEAD PLAINTIFF'S SELECTION OF  
COUNSEL**

**CLASS ACTION**

Movant Wah Kee Ho ("Movant"), through counsel, hereby moves the Court pursuant to Section 21D of the Securities and Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), for an order:

(a) appointing Movant as Lead Plaintiff in this action; and

(b) approving Movant's selection of The Rosen Law Firm P.A. as Lead Counsel and Steckler Gresham Cochran PLLC as Liaison Counsel for the litigation and all subsequently filed related litigations.

In support of this Motion, Movant submits: (1) a Memorandum of Law dated January 15, 2019; (2) Appendix Accompanying Movant's Motion, dated January 15, 2019; and (3) a [Proposed] Order Appointing Movant as Lead Plaintiff and Approving Movant's Selection of Counsel.

**CERTIFICATE OF CONFERENCE**

Local Rule 7.1(D) requires a conference of counsel prior to filing motions. Due to the PSLRA's lead plaintiff procedure, however, Movant does not yet know which other entities or

persons plan to move for appointment as lead plaintiff until after all the movants have filed their respective motions. Under these circumstances, Movant respectfully requests that the conferral requirement of Local Rule 7.1(D) be waived.

Dated: January 15, 2019

Respectfully submitted,

**STECKLER GRESHAM COCHRAN PLLC**

/s/ R. Dean Gresham

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[Proposed] Liaison Counsel for Plaintiff and Class

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[Proposed] Lead Counsel for Plaintiff and Class

**THE SCHALL LAW FIRM**

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Additional Counsel to Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of January 2019, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ R. Dean Gresham